



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Roy E. Crabtree, Ph.D.
Regional Administrator
National Marine Fisheries Service, NOAA
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701

FEB 16 2016

Re: Final Environmental Impact Statement (FEIS) for the Red Snapper Allocation Amendment 28 to the Fishery Management Plan for the Reef Fish Resources of the Gulf of Mexico (RIN 0648-BD68); CEQ No.: 20160003

Dear Mr. Crabtree:

The U. S. Environmental Protection Agency (EPA) has reviewed the above-referenced document in accordance with our responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The purpose of the principal action, Regulatory Amendment 28, proposed by the Gulf of Mexico Fishery Management Council (Council), is the reallocation of the red snapper harvest consistent with the 2014 red snapper assessment update (SEDAR 31 Update 2015) to ensure that allowable catch and recovery benefits are fairly and equitably allocated between the commercial and recreational sectors to achieve optimum yield. The need is to base sector allocations on the best scientific information available, while achieving optimum yield, particularly with respect to food production and recreational opportunities, and rebuilding the red snapper stock.

The EPA has the responsibility to review and comment on major Federal actions significantly affecting the quality of the human environment, including Fishery Management Plans (FMPs) and FMP Amendments as developed, approved, and implemented under the Magnuson-Stevens Fishery Conservation and Management Act (MSA) where those Plans and Amendments are subject to the EIS requirements of NEPA. It should be clear, however, that we defer to the National Marine Fisheries Service (NMFS) and the Council as to the development of fishery statistics and the relative importance of the commercial and recreational fisheries for each species.

The EPA provided comments on the Draft Environmental Impact Statement (DEIS) to the NMFS on July 16, 2015. Based on our review of the FEIS and the response to comments included in Appendix D of the FEIS, we have no further concerns at this time regarding the preferred alternatives, economic analysis, and environmental justice.

Additionally, even though we did not previously comment on the climate change discussion in the DEIS, the EPA appreciates the incorporation of climate change language we recommended in response to other more recent proposed actions. Specifically, the following language was included in the FEIS in its entirety on pages 43 and 98:

Scientific evidence supports the concern that continued increases in greenhouse gas emissions (GHG) resulting from human activities contribute to climate change. Climate changes could have significant effects on Gulf of Mexico fisheries. Possible impacts include temperature changes in coastal and marine ecosystems that can influence organism metabolism and alter ecological processes such as productivity and species interactions; changes in precipitation patterns and a rise in sea level which could change the water balance of coastal ecosystems; altering patterns of wind and water circulation in the ocean environment; and influencing the productivity of critical coastal ecosystems, such as wetlands, estuaries, and coral reefs.

The NMFS also discussed potential impacts of climate change on red snapper fish stocks in the Gulf of Mexico. However, actions from this amendment are not expected to significantly contribute to climate change through the increase or decrease in the carbon footprint from fishing activities.

In closing, thank you for addressing our environmental concerns. If you have further questions, please contact Kim Gates of the NEPA Program Office at (404) 562-9261 or gates.kim@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Chris A. Militscher", with a long horizontal flourish extending to the right.

Christopher A. Militscher, Chief
NEPA Program Office
Resource Conservation and Restoration Division